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December 3, 2020

## By ECF

Hon. Vincent L. Briccetti United States District Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

> Re: <u>United States v. Derek aka Dereck Moorer - VOSR</u> 15 Cr 468 (VLB)

Dear Judge Briccetti:

I write requesting that the Court adjourn the conference scheduled for December 17, 2020 to a date a week or two after January 11, 2021.

I have spoken with AUSA Lindsey Keenan and the Government does not object to this request.

The reason for the request is as follows: Mr. Moorer is charged in this VOSR with multiple violations of his supervised release including Specifications 1 and 2 which pertain to a pending domestic violence case in Queens County. The parties are unable to come to an agreed upon proposal to resolve the VOSR charges at this time. Mr. Moorer's case in Queens is next scheduled for January 11, 2021 and we anticipate that it is quite likely that the criminal charges that serve as the basis for Specifications 1 and 2 herein will be dismissed on that date. We are hopeful that once the criminal charges against Mr. Moorer are dismissed that the parties will be more likely to agree upon a proposed resolution on the VOSR pending in this Court so as to avoid the necessity of a hearing. It is for that reason that we are requesting an adjournment.

If the foregoing meets with the Court's approval, then we respectfully request that the Court adjourn the December 17, 2020 conference.

Thank you for your consideration in this matter.

Respectfully submitted, Many S. End Daniel S. Parker Parker and Carmody, LLP 850 Third Avenue 14th Floor New York, NY 10022 Cell: 917-670-7622 Cc: all parties (by email) APPLICATION GRANTED SO ORDERED! Vincent L. Briccetti, U.S.D.J.

Dated: 12 14 20 20

White Plains, NY

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Case is adjourned to: The Court expects to conduct the conference in person at the court house.